REMARKS/ARGUMENTS

Claims 1-28 are pending in this application. Claims 1, 2, 9, 21, and 22 stand rejected and claims 3-8, 10-14, and 23-28 are objected to. Applicant wishes to thank the Examiner for the indication of allowance of claims 15-20, and the indication of allowable subject matter in claims 3-8, 9-14, and 23-28, but respectfully submits that each of claims 1, 2, 21, and 22 patentably distinguish over the prior art as will be described in detail below. By this Amendment, claims 1-28 have been amended and new claims 29-32 have been added. The amendments made to claims 1-28 do not alter the scope of these claims, nor have these amendments been made to define over the prior art. Rather, the amendments to the claims have been made for cosmetic reasons to improve the form thereof. In light of the amendments and remarks set forth below, Applicant respectfully submits that each of the pending claims is in immediate condition for allowance.

Paragraph 5 of the Office Action rejected claim 21 under 35 U.S.C. § 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In accordance with the Office Action, and to more clearly define the invention, Applicant has amended claim 21 to provide proper antecedent basis for the limitations in the claim. Consequently, Applicant requests that the Examiner withdraw the rejection under 35 U.S.C. § 112.

The Office Action rejects claims 1 and 21 under 35 U.S.C. § 103 as unpatentable over U.S. Patent No. 6,351,655 to Tsuji *et al.* ("Tsuji") in view of U.S. Patent No. 6,044,248 to Mochizuki *et al.* ("Mochizuki"). Claims 2 and 22 are rejected under 35 U.S.C. § 103 as unpatentable over Tsuji and Mochizuki further in view of U.S. Patent No. 5,671,014 to Ito *et al.* ("Ito"). Applicant respectfully traverses the rejections.

To establish a prima facie case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify a reference or combine references to arrive at the

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claimed subject matter. The prior art references must also teach or suggest all the limitations of the claim in question. See MPEP § 706.02(j).

A reference can only be used for what it clearly discloses or suggests. See In re Hummer, 113 U.S.P.Q. 66 (C.C.P.A. 1957); In re Stencel, 4 U.S.P.Q.2d 1071, 1073 (Fed. Cir. 1987). Here, the references, whether taken individually or in combination, do not disclose or suggest the invention claimed by the Applicant.

Among the limitations of Claim 1 that are neither disclosed nor suggested by the prior art of record are a destination call control system which includes:

> area specification means for specifying a destination image area within the image displayed on said display;
>
> input means for entering destination data corresponding to the destination image area;
>
> data registration means for calculating coordinate data of the destination image area, associating the coordinate data with the destination data, and registering the associated data with said database means;
>
> destination data search means for calculating the coordinates of the area indicating a destination image area for searching said database mans for the destination data associated with the coordinates;

According to the present invention, area specification means are used to specify an area within a displayed image. Input means are used to enter destination data corresponding to the area specified by the area specification means. Data registration means then calculate coordinate data for the specified area. The coordinate data is then associated with the destination data. The associated data is then stored in a database. To place a call, an image area associated with destination data is selected. The destination data associated with the selected image area is retrieved from the database and the call is placed.

Tsuji discloses a telephone apparatus that includes a display unit and a storage unit for storing a plurality of registration data sets randomly registered. Each of the plurality of registration data sets includes a destination name and a phone number of the destination. (See Tsuji, Abstract). Registration data is displayed on the display section 2.

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Icons such as "home," "office" and "portable phone" are shown as the specification data of the registered phone numbers. The phone numbers can be recognized by seeing pictographs of these icons. (See Tsuji, col. 6, lns. 42-47).

The Office Action notes that Tsuji does not disclose image storage means, image specification means, and destination data search means. The Office Action attempts to use Mochizuki to show these features. However, Mochizuki does not disclose image storage means, image specification means, and destination data search means as explicitly claimed by Applicant.

Mochizuki discloses a selective call receiver that is capable of transmitting and receiving graphic images including text messages. (See Mochizuki Figures 9,10). The call receiver includes a code memory storing a plurality of graphic image units and graphic image unit codes, and a plurality of pieces of character data and character data codes. The disclosed call receiver extracts code information from a received message having a predetermined format. Based on the code information, character and image data are read from a memory and displayed on the screen. Graphic images can be displayed in up to four display areas L1-L4. (See Mochizuki col. 5, lns. 8-20). Text added to the graphic image can also be displayed in one of the four display areas. (See Mochizuki col. 6, lns. 60-64). Mochizuki does not disclose "data registration means for calculating coordinate data of the destination image area, associating the coordinate data with the destination data, and registering the associated data with said database means; destination data search means for calculating the coordinates of the area indicating a destination image area for searching said database mans for the destination data associated with the coordinates" as explicitly required in Applicant's claim 1.

Among the limitations of Claim 21 that are neither disclosed nor suggested by the prior art of record are a destination call control system which includes:

> a data registration unit configured to calculate coordinate data of the area specified by said area specification unit as a destination image area,

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associating the coordinate data with the destination data entered from said input unit, and to register the associated data with said database;

destination data search unit configured to calculate the coordinates of the area specified by said area specification unit as a destination and to search said database for the destination data based on the coordinates; and

a calling unit calling the destination based on the destination data obtained by said destination data search unit.

Claim 21 is patentable over the prior art of record for the reasons discussed above. The references cited do not disclose a destination control calling system wherein an area specification unit allows a user to specify a desired area of an image and a data registration unit then calculates coordinate data for the desired image area. The coordinate data is then associated with destination data, which is stored in a database. Calls are placed by selecting an area of an image, retrieving the destination data associated with the selected area, and placing a call using the retrieved destination data.

Claims 2 and 22 depend from, and contain all the limitations of claims 1 and 21 respectively. These dependent claims also recite additional limitations which, in combination with the limitations of claims 1 and 21, are neither disclosed nor suggested by Tsuji and Mochizuki further in view of Ito and are also believed to be directed towards the patentable subject matter. Thus, claims 2 and 22 should also be allowed.

Applicant has responded to all of the rejections and objections recited in the Office reconsideration and Notice of Allowance for all of the pending claims is therefore respectfully requested.

The amendments to the claims are for cosmetic purposes only and are not intended to limit the scope of the claims in any way. It is asserted that the present amendment places the application in a form for allowance. Entry of this amendment is therefore earnestly solicited.

If the Examiner believes an interview would be of assistance, the Examiner is welcome to contact the undersigned at the number listed below.

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Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is captioned **"Version with markings to show changes made."**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

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Respectfully submitted,

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APPENDIX A
Version With Markings To Show Changes Made
37 C.F.R. § 1.121(b)(1)(iii) AND (c)(1)(ii)

ABSTRACT OF THE DISCLOSURE

[The present invention provides a] A destination calling control system [which comprises] comprising a database 5, an image data storage unit 4, a display unit 2 on which image data stored in the image data storage unit 4 is displayed, area specification means for allowing the user to specify a desired area within an image displayed on the display unit 2, an input unit 3 through which the user enters destination data, a data registration unit 12 which calculates the coordinates of a destination image area specified by the above-described area specification means as a destination image area, associates the coordinates with destination data entered from the display unit 2, and registers the correspondence data with the database 5, and a destination data search unit 13 which calculates the coordinates of an area specified by the area specification means as the destination and, based on the calculated coordinates, searches the database 5 for destination data.

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CLAIMS:

1.   (Amended)   A destination calling control system comprising:

a database [means];

an image storage [means] for storing [therein] image data;

a display [means] for displaying [thereon the] said image data [stored in said image storage means];

area specification means for [allowing a user to specify] specifying a [desired] destination image area within [the] an image displayed on said display [means];

input means [through which the user enters] for entering destination data corresponding to the destination image area;

data registration means for calculating coordinate data of [the area specified by said area specification means as a] said destination image area, associating [the] said coordinate data with the destination data [entered from said input means], and [for registering the] storing said associated data in [with] said database [means;

destination data search means for calculating the coordinates of the a selected area indicating a destination image area specified by said area specification means as a destination and for searching said database means for the destination data based on the associated with the coordinates; and

calling means for calling the destination based on the destination data obtained by said destination data search means].

2.   (Amended)   The destination calling control system as defined by claim 1, wherein

said display [means] comprises a touch screen [; and]

[said area specification means allows the user to specify the area through said touch screen].

3.   (Amended)   The destination calling control system as defined by claim 1, further comprising:

an image capturing [means] device for capturing a plurality of destination images;

a title image creator [creation means] for creating a title image; and

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an image paster [pasting means] for [pasting] creating a paste image comprising said the title image [created by said title image creation means] and said [the] plurality of destination images [captured by said image capturing means] and for storing the [pasted images into] paste image in said image [storing] storage [means].

4.   (Amended)   The destination calling control system as defined by claim 3, wherein said display [means] displays said [the] title image [of a paste image stored in said image storage means] as a reference and allows [the] a user to scroll across [a whole of] the paste image.

5.   (Amended)   The destination calling control system as defined by claim 3, wherein

each destination image and the title image [of the paste image stored in said image storage means] are each assigned a corresponding number on a numeric keypad [on a ten-key pad], and

said display [means] displays the destination image or the title image in response to the number of the numeric key that is pressed.

6.   (Amended)   The destination calling control system as defined by claim 3 wherein the destination image captured by said image capturing [means] device is a [photograph] photographic image.

7.   (Amended)   The destination calling control system as defined by claim 3, wherein at least one of destination images of said paste image is a handwritten input image created by said title image [creation means] creator.

8.   (Amended)   The destination calling control system as defined by claim 1 wherein said data registration means [extracts] determines an outline of [a destination object in the] said destination image area [specified by said area specification means], calculates the coordinate data of [an area encircled by the] said outline, associates [the] said coordinate data with [the] said destination data [entered from said input means], and stores [the] said associated data [into] in said database [means].

9.   (Amended)   A destination calling control method comprising:
    [a first step of] capturing [desired] image data; [and for]

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storing the <u>image</u> data;

<u>displaying said image data as a displayed image;</u>

[a second step of allowing a user to specify a desired] <u>specifying a destination</u> <u>image</u> area within [an image] <u>said</u> displayed [based on the] image; [data stored in said first step and, at the same time, to enter]

<u>entering</u> destination data [on] <u>corresponding to said</u> [the] destination image area;

[a third step of] calculating coordinate date [of] <u>for said</u> [the] destination image area [specified in said second step], associating [the] <u>said</u> coordinate data with [the destination data on the] <u>said</u> destination image area, [said destination data being entered in said second step] and [registering] <u>storing</u> the associated data with a database;

[a fourth step of allowing the user to specify, as a] <u>retrieving destination data by</u> <u>specifying said</u> destination [, the desired area in the] image [displayed based on the image data stored in said first step] <u>area</u>; [and]

[a fifth step of] calculating <u>said</u> [the coordinate] <u>coordinates</u> of [the] <u>said</u> <u>destination image</u> area [specified in said fourth step], searching said database for the destination data [based on the coordinate,]; and

calling [the] <u>said</u> destination [based on] <u>corresponding to</u> the destination data.

10.   (Amended)   The destination calling control method as defined by claim 9, [wherein a paste image, created by] <u>further comprising:</u>

<u>creating a paste image by</u> pasting a plurality of destination images and a title image [, is stored as the image data stored in said first step, the title image of the stored paste image is displayed as a reference, and a desired destination image is selected by continuously scrolling across a whole of the paste image on the display screen];

<u>storing said paste image;</u>

<u>displaying said title image as a reference; and</u>

<u>selecting a destination image by scrolling across said paste image on the display.</u>

11.   (Amended)   The destination calling control method as defined by claim 9, [wherein a paste image, created by pasting a plurality of destination images and a title image, is stored as the image data stored in said first step, each destination image and the title image of the stored paste image are each assigned] <u>further comprising assigning</u> a unique number on a

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numeric [key on a ten-key pad] keypad to said paste image, and displaying the destination image or the title image [is displayed] in response to the number of the numeric key that is pressed.

12.   (Amended)   The destination calling control method as defined by claim 10, wherein a photographic [photograph] image or a handwritten input image is used as the destination images constituting said paste image.

13.   (Amended)   The destination calling control method as defined by claim 11, wherein a photographic [photograph] image or a handwritten input image is used as the destination images constituting said paste image.

14.   (Amended)   The destination calling control method as defined by claim 9 wherein the coordinate data of [the] said destination image area [calculated in said third step] is obtained by extracting an outline of a destination object in [the] said destination image area and by calculating [the] said coordinates of an area encircled by [the] said outline.

15.   (Amended)   A computer readable program product [carried on a medium], said [which] program product is configured to execute in a computer the following destination calling control method comprising:

[a first step of] capturing desired image data and [for] storing [the] said data;

displaying said image data;

[a second step of allowing a user to specify] specifying a desired area within an image displayed [based on] corresponding to said [the] image data [stored in said first step] and, [at the same time, to enter] entering destination data [on] corresponding to said [the] destination image area;

[a third step of] calculating coordinate data of [the destination image] said desired area [specified in said second step], associating [the] said coordinate data with [the] said destination data [on the destination image area, said destination data being entered in said second step,] and [registering the] storing said associated data with a database;

[a fourth step of allowing the user to specify,] specifying as a destination, the desired are in the image [displayed based on the image data stored in said first step;] and

[a fifth step of] calculating the coordinate of the desired area specified [in said fourth step,] searching said database for the destination data based on the coordinate, and calling the destination based on the destination data.

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16. (Amended) The computer readable program product as defined by claim 15, [wherein a paste image, created] further comprising creating a paste image by pasting a plurality of destination images [and] with a title image [, is stored as the image data stored in said first step, the title image of the stored paste image is displayed as a reference, and a desired destination image is selected by continuously];

storing said paste image;

displaying said title image as a reference; and

selecting said destination image by scrolling across [a whole of] the paste image on the display screen.

17. (Amended) The computer readable program product as defined by claim 15, [wherein a paste image, created by pasting a plurality of destination images and a title image, is stored as the image data stored in said first step, each destination image and the title image of the stored paste image are each assigned] further comprising:

assigning a unique number on a numeric [key on a ten-key pad] keypad to each paste image, and [the destination image or the title image is displayed] displaying the paste image assigned to said numeric key in response to the number of the numeric key that is pressed.

18. (Amended) The computer readable program product as defined by claim 16 wherein a [photograph] photographic image or handwritten input image is used as the destination images constituting said paste image.

19. (Amended) The computer readable program product as defined by claim 17 wherein a [photograph] photographic image or a handwritten input image is used as the destination images constituting said paste image.

20. (Amended) The computer readable program product as defined by claim 15 wherein the coordinate data of [the] said destination image area calculated [in said third step] is obtained by extracting an outline of a destination object in [the] said destination image area and by calculating [the] said coordinates of an area encircled by [the] said outline.

21. (Amended) A destination calling control system comprising:

a memory device configured to store a database;

an image storage unit for storing [therein] image data;

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a display unit _for_ displaying [thereon] the image data [stored in said image storage unit];

an area specification unit configured to allow a user to specify a desired area within the image displayed on said display unit;

an input unit [through which the user enters] _for entering_ destination data;

a data registration unit configured to calculate coordinate data of the area specified by said area specification unit as a destination image area, associating the coordinate data with the destination data entered from said input unit, and to register the associated data with said database [means];

a destination data search unit configured to calculate the coordinates of the area specified by said area specification [means] _unit_ as a destination and to search said database [means] for the destination data based on the coordinates; and

a calling unit calling the destination based on the destination data obtained by said destination data search unit.

22. (Amended) The destination calling control system as defined by claim 21 wherein

said display unit comprises a touch screen [; and

said area specification unit allows the user to specify the are through said touch screen].

23. (Amended) The destination calling control system as defined by claim 21, further comprising:

an image capturing unit configured to capture at least one destination _image_ [images];

a title image creation unit creating a title image; and

an image pasting unit configured to paste the title image created by said title image creation unit and destination image captured by said image capturing unit and to store the pasted images into said image storage unit.

24. (Amended) The destination calling control system as defined by claim 23 wherein said display unit displays [the] _said_ title image of a paste image [stored in said image storage unit] as a reference and allows the user to scroll across a whole of the paste image.

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25.   (Amended)   The destination calling control system as defined by claim 23 wherein

each destination image and the title image of the paste image [stored in said image storage unit are each] is assigned a number on a [numeric key on a ten-key pad] keypad, and

said display unit displays the destination image or the title image in response to the [number] of the [numeric] key of said keypad that is pressed.

26.   (Amended)   The destination calling control system as defined by claim 23 wherein the destination image captured by said image capturing unit is a photographic [photograph] image.

27.   (Amended)   The destination calling control system as defined by claim 23 wherein at least one of said destination images of said paste image is a handwritten input image created by said title image creation unit.

28.   (Amended)   The destination calling control system as defined by claim 21 wherein said data registration unit extracts an outline of a destination object in the destination image area [specified by said area specification unit], calculates the coordinate data of an area encircled by the outline, associates the coordinate data with the destination data [entered from said input unit], and stores the associated data [into] in said database.

29.   (New) The destination calling control system according to claim 1, further comprising:

destination data search means for calculating coordinates of a selected area indicating a destination image area for searching said database mans for the destination data associated with the coordinates; and

calling means for calling the destination associated with the destination data obtained by said destination data search means

30.   (New) A destination calling control method comprising:

capturing an image;

storing said image;

selecting a portion of said image;

entering destination data corresponding to said portion of said image;

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storing said destination data corresponding to said portion of said image;

retrieving said destination data by selecting said portion of said image; and

dialing a call utilizing said destination data.

31. (New) The destination calling control method according to claim 30 wherein said image includes at least a portion of a person.

32. (New) A destination calling apparatus comprising:

a memory for storing an image;

a display for displaying said image;

a selector for selecting a portion of said image;

an input device for entering destination data corresponding to said portion of said image;

a register for calculating coordinate data for said portion of said image, associating said coordinate data with said destination data, and storing said associated data in said store;

a searcher for retrieving destination data based on coordinates of a portion of said image selected by said selector; and

a calling device for calling using the destination data retrieved by said searcher.

32. (New) A computer readable program product according to claim 15 wherein said program product is carried on a medium.